

Date:

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

To whom it may concern:

*We want honest + clear labeling, please
DSHEA does give us enough protection if you'll
use DSHEA!*

As a consumer and citizen, I ask the FDA to retain the current labeling law, the current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods.

On the issue of labeling, in its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. Consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics when compared to untreated foods; consumers may reject these foods unless they know they have been irradiated. Fruits and vegetables may have nutrient losses that are not obvious or expected by the consumer.

In addition, processing by irradiation causes chemical changes that are not evident, some of which are potentially hazardous. Meat may have a higher level of carcinogenic benzene. Some irradiated foods contain unique radiolytic products that have never been tested.

Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have a right to know if this process has been used on their food.

As to the kind of label used, I believe that label should be large enough to be readily visible to the consumer, on the front of the package. The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura).

Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should not be permitted to expire. I urge you to place the comments received on the Internet so that the public is most easily made aware of the views of those participating in the comment process.

Yours truly,

Ellen + John Duwald, Registered Voters

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